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STATE ETHICS COMMISSION

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COMMISSION MEMBERS

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REVEREND JOHN WESLEY HOLLAND
M. PETER MOSER
BETTY B. NELSON
BARBARA M. STECKEL

STATE ETHICS COMMISSION

Eighth Annual Report

January 1, 1986 - December 31, 1986

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MARYLAND STATE ARCHIVES

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State Ethics Commission
Room 1515
301 West Preston Street
Baltimore, Maryland 21201
(301) 225-1030

COMMISSION MEMBERS:

Barbara M. Steckel, Chairman
William J. Evans
Reverend John Wesley Holland
M. Peter Moser
Betty B. Nelson

COMMISSION STAFF:

John E. O'Donnell, Executive Director
Nancy L. Speck, General Counsel
Robert A. Hahn, Staff Counsel

NOTE: Mr. William J. Evans and Mr. M. Peter Moser did not attend their first Ethics Commission meeting until January of 1987. Mr. Herbert J. Belgrad served on the Commission until September of 1986 and Mr. Thomas D. Washburne served until December of 1986.

State Ethics Commission

Eighth Annual Report

January 1, 1986 - December 31, 1986

GENERAL STATUTORY IMPLEMENTATION

The State Ethics Commission met twelve times during Calendar Year 1986. During the year the Commission was involved in program activity relating to all areas of its statutory mandate. These include financial disclosure, conflict of interest, lobbyist disclosure, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters and public information activities.

Issuance of Advisory Opinions

The Commission issues advisory opinions in response to requests from officials, employees, and others who are subject to the Law. Additionally, the Commission may issue advisory opinions to other persons. During Calendar Year 1986 the Commission received 42 requests for advisory opinions and issued 32 formal published opinions. There were five requests for advisory opinions pending at the end of the calendar year. (Some of the original requests were handled without formal advice.) All of the opinions issued in 1986 involved the conflict of interest provisions of the Law. Most of these dealt with the employment or ownership interest prohibitions under section 3-103(a) of the Law. Other areas of the Law cited in opinions include the non-participation requirements, the prohibition against using position for personal gain, and the post-employment restrictions. One factor reducing the number of formal opinion requests and opinions issued is the large number of existing opinions that can now be used for informal guidance. The Commission staff was able to provide guidance in about 350 potential situations based on existing opinions of the Commission. The Commission itself provided informal advice in lieu of formal guidance based on past opinions in 29 situations during the year.

Financial Disclosure

The administration of the financial disclosure program continued to involve the identification of those required to file, providing technical assistance to filers and monitoring compliance with the Law. Compliance review of forms was conducted as part of a phased program for review of the forms of all officials and employees. Steps were also taken to implement the special savings and loan

financial disclosure program that went smoothly as a result of receiving cooperation from many State agencies. Under this program officials were required to file a special supplemental disclosure statement covering certain withdrawals from savings and loan institutions. However, because the Commission received no additional resources to implement this program, the large number of additional filings caused a substantial delay in review and compliance activities in the regular financial disclosure program. Currently there are over 5,000 officials filing financial disclosure forms. In addition, copies of all judicial official financial disclosure forms are also filed at the Commission office.

A significant activity during the first half of the year was working with the State Administrative Board of Elections and the local election boards on the filing of candidates' financial disclosure statements. In addition to handling a large number of requests for assistance over the telephone, the Commission staff provided on-site assistance at the State Election Board office in the last days prior to the filing deadline. Over 570 non-incumbent candidates filed financial disclosure statement with the Commission during 1986. Substantial review and follow-up activity was needed in order to process these forms.

In addition to the regular financial disclosure program, gubernatorial appointees to boards or commissions seeking limited conflict of interest exemptions must disclose the area of potential of conflict with the Commission. In 1986 113 of these forms were filed with the Commission.

Lobbyist Disclosure and Regulation

During the lobbying year which ended on October 31, 1986, 687 registrations were filed with the Commission. This represents an increase from the 665 registrations in the previous year. Although the largest number of lobbyists are registered during the legislative session, registrations are beginning and ending throughout the lobbying year, which begins on November 1 and ends on October 31 of the following year. Most persons registered to lobby have only a single registration representing one employer. However, fifty-nine lobbyists had two or more registrations during this time period. Twenty-six registrants had four or more employers. The \$6,792,763 in expenditures reported for the period of October 31, 1986 represents a decrease of \$161,451 over the previous year. Lobbying expenditures had significantly increased each year since the Commission reported \$2,864,454 of expenditures in 1979, the first year the Ethics Commission administered the filing program. There was an increase of \$372,000 from the previous year for the six-month period which includes the 90-day session of the General Assembly, but this increase was offset by a decrease in reporting expenditures during the period covering 5/1/86 to 10/31/86. It is likely that this decrease was caused by a light election year summer legislative agenda and the fact that there was no special legislative session. There was also a substantial drop in the amounts reported for professional technical research. It should be noted, however, that the amounts expended on lobbyist compensation and on meals and beverages for officials continued to increase. An analysis of individual reports indicates that twenty-seven lobbyist employers reported having total lobbying expenditures of \$50,000 or more. Reports of individual lobbyists registered on behalf of one or more employers indicate that eighteen of these persons

reported \$50,000 or more in compensation for services. Six lobbyists reported compensation of \$100,000 or more. Topic areas involving large total employer expenditures during the reporting periods included health, utilities, insurance, banking, transportation, business and labor. A list of those employers expending \$25,000 or more and those lobbyists reporting \$50,000 or more in compensation is included in the appendices of this report.

The following expenditure data summarizes lobbying expenditures for the last three lobbying years:

	10/31/84	10/31/85	10/31/86
1. Expenditures for meals and beverages for officials or employees or their immediate families.	\$ 209,657	\$ 234,615	\$ 267,738
2. Expenditures for special events, including parties, dinners, athletic events, entertainment, and other functions to which all members of the General Assembly, either house thereof, or any standing committee thereof were invited. (Date, location, group benefited, and total expense for each event are also reported.)	\$ 120,598	\$ 134,735	\$ 168,663
3. Expenses for food, lodging, and scheduled entertainment of officials and employees and spouses for a meeting given in return for participation in a panel or speaking engagement at the meeting.	\$ 9,930	\$ 8,067	\$ 15,134
*4. Expenditures for gifts to or for officials or employees or their immediate families (not including sums reported in 1, 2, and 3).	\$ 64,094	\$ 285,811	\$ 228,228
<u>Subtotal of items 1, 2, 3, & 4</u>	<u>\$ 404,279</u>	<u>\$ 663,228</u>	<u>\$ 679,763</u>

5.	Total compensation paid to registrant (not including sums reported in any other section).	\$3,757,645	\$4,604,085	\$4,812,012
6.	Salaries, compensation and reimbursed expenses for staff of the registrant.	\$ 289,263	\$ 422,828	\$ 342,357
7.	Office expenses not reported in items 5 and 6.	\$ 369,506	\$ 380,676	\$ 465,614
8.	Cost of professional and technical research and assistance not reported in items 5 and 6.	\$ 251,280	\$ 450,847	\$ 78,301
9.	Cost of publications which expressly encourage persons to communicate with officials or employees.	\$ 155,155	\$ 136,280	\$ 233,396
10.	Fees and expenses paid to witnesses.	\$ 11,824	\$ 28,238	\$ 5,409
11.	Other expenses.	\$ 164,811	\$ 267,697	\$ 175,576
	<u>Total of items 1 through 11</u>	<u>\$5,403,763</u>	<u>\$6,953,879</u>	<u>\$6,792,428</u>

* This category includes the value of race track passes distributed by racing industry lobbyists to State officials. This activity began to be more fully reflected in the annual report figures in 1984. \$212,410 of the \$228,228 reported for gifts in the period ending 10/31/86 reflects value of these passes.

Enforcement Activities

The Ethics Law and implementing rules of the Commission provide that any person may file a complaint with the Commission. Complaints must be signed under oath, and allege a violation of the Law by a person subject to the Law. Additionally, the Commission may file a complaint on its own initiative, and carries out preliminary inquiries at its discretion.

In Calendar Year 1986 the Commission issued fourteen complaints. Eight complaints involved financial disclosure matters, one complaint related to conflict of interest issues, and five complaints involved the lobbying law. Also, during this year action was completed on thirty complaints. Twenty of these completed complaint cases were financial disclosure matters, four were conflict of interest matters, and six were lobbying matters. Three complaints were still active at the end of the Calendar Year. Seven failure to file financial disclosure complaints were terminated by accepting late filing as a cure. Nine late financial disclosure filing cases were completed by an admission of violation, waiver of confidentiality, acceptance of a reprimand, and the payment of \$100 to the State in lieu of a potential fine. Three complaints concluded with a finding of violation of the Law after a hearing. In one of these three matters the respondent entered into a dispositional agreement admitting a violation and paying \$100 in lieu of a potential fine.

Four conflict of interest complaints were completed in 1986. One complaint was completed by a dismissal of the complaint based on hearing. In another complaint matter the respondent was found to have violated the Law and was reprimanded by the Commission. Further discipline by the employing agency was also recommended in this case. Two complaints were completed by settlement agreements. One of these cases involving post-employment activities resulted in an admission of violation and a payment of \$3,000 in lieu of potential fines. Action was completed on six late filing of lobbying activity report complaints. Five of these complaints were completed by accepting late activity reports as a cure. One complaint was completed by a hearing resulting in a finding of violation and a reprimand. One lobbyist matter was also referred to a law enforcement agency for its review. The Commission also initiated sixteen preliminary inquiries regarding either conflict of interest or lobbying matters during 1986 in order to evaluate whether a complaint should be filed. Ten preliminary inquiries were still in process at the end of the year.

Financial disclosure complaints were the result of a continuing compliance review program to ensure that individuals comply with the filing requirement on a timely basis. Due to the special savings and loan financial disclosure filing due on August 1, 1986, the normal follow up on late filing was delayed. This resulted in a reduced number of late filing complaints being issued in 1986, but these complaints will be reflected in 1987 data. The processing of financial disclosure complaints has become an expensive and time consuming process. Although the number of people failing to file after two notices represents only about 2% of those required to file, the Commission believes that in lieu of resorting to court ordered fines, some financial sanction to those who continue to ignore the filing requirements even after a hearing notice has been issued, is necessary to insure timely availability of forms. Therefore, the Commission has announced a general settlement policy of requiring an admission of violation, a reprimand, and a \$100 payment in lieu of a fine in complaint cases where there is a second complaint or where the form is filed at any time after a hearing notice is sent to the non-filer. This hearing notice generally occurs about 120 days after the report is due and follows two other notices and a complaint document. There are also a

growing number lobbyists that are late in registration or significantly late in activity reporting. There have been some instances where the same registrant has been late on more than one occasion. There is a need for Commission fining authority or a late fee to deter untimely registration and reporting. As to either financial disclosure or lobbyist matters, in cases where a case completion cannot be accomplished consistent with cure or the settlement criteria, a formal hearing is held by the Commission, with the final decisions and actions based on the record as proved at that proceeding.

Local Government Ethics Laws

Maryland counties and cities are required under Title 6 of the Ethics Law to enact local laws similar to the State law. Criteria for evaluating similarity to the State Law are defined in Commission regulations. Municipalities, based on size and other factors, may be exempted from all or part of the requirement, though an exemption may be granted only in response to a written request. The Commission was primarily involved during 1986 in reviewing amendments to enacted laws. At the end of 1986 five municipalities had laws which did not fully meet Commission requirements. It is likely that three of these municipalities will be fully or partially exempted from the law based on size and related considerations.

In addition to the requirement that counties and cities enact ethics laws, the 1983 Session of the General Assembly amended the Law to require local school boards either to promulgate ethics regulations similar to the State Law or be covered by county ethics laws. The Commission issued regulations covering this requirement in 1983. At the end of 1986, twenty-two county Boards of Education including Baltimore City had issued regulations which had been approved by the Commission. Most of the staff activity relating to local ethics programs during 1986 involved providing technical assistance to local ethics officials regarding ongoing administration of local government ethics programs.

Educational and Informational Activities

The Commission staff has been active in providing information to those covered by the Ethics Law, as well as other persons interested in its requirements. A substantial daily staff workload has involved advising employees, officials, candidates, and lobbyists on how to complete forms and providing informal advice regarding possible conflicts of interest. The Commission staff has also assisted local government and school board officials in drafting their ethics laws and regulations. The staff has also provided technical advice to many local government ethics boards. A presentation on ethics requirements was made at the annual meeting of the Maryland Municipal League.

A briefing for lobbyists and those interested in the operation of the lobbying law was held in Annapolis during the 1986 Session of the General Assembly. The Commission has continued to maintain an office in Annapolis during the legislative session in order to provide assistance in the completion of lobbying or financial disclosure forms. The Commission staff provided special one-day on-site ethics training programs to managers of various cabinet departments and is providing ethics training to managers as part of a new State executive training program.

Part of the Commission's public information activity involves distribution of lists of registered lobbyists and provision of assistance to persons inspecting various forms filed with the Commission. Pamphlets describing the Ethics Law have been made available to management level employees in all State agencies. Another pamphlet covering ethics requirements for part-time members of State boards and commissions is also being distributed. A new pamphlet covering public access to Commission records and decision information was distributed for the first time in 1986. The Commission has also initiated a new ethics bulletin. This quarterly publication, which covers prohibitions, rules, procedures and Commission decisions, is being provided to key agency managers and personnel officers. Arrangements were also made for a special ethics requirements article to be published in the Department of Personnel newsletter. The Commission staff also hosted a training program involving its staff and the staff of lobbying registration agencies of several other states.

LEGISLATIVE RECOMMENDATIONS AND ISSUES

The Commission continues to review the adequacy of the Public Ethics Law as required by the statute. The following four areas are new legislative recommendations developed in 1986.

1. Candidates' Disclosure Enforcement

The Commission has now experienced two general elections since it was established in 1979. For the most part, the procedure for filing candidates' financial disclosure statements has worked reasonably well. However, a significant actual and potential problem has developed regarding enforcement of requirements for complete and accurate candidates disclosure. A large number of candidates' disclosure statements are filed in the last few weeks prior to the filing deadline. Often these are statements of non-incumbent filers with little or no experience in filing disclosure statements. A large percentage of these forms require amendments, additional information or clarification. In situations where a person fails to comply with these requirements, even deliberately, the existing Law and procedures do not allow for the public to be aware of this problem on a timely basis. Generally, before a violation can be found a variety of

confidential administrative and adjudicatory processes have to occur. These include notices as to deficiencies, complaint filing, opportunity to cure, a hearing notice, the hearing, and the right to appeal. In most cases this process would, by necessity, extend well beyond the primary election and possibly beyond the general election. As a result of this process and the confidentiality requirements, serious completion problems or even false disclosure could exist unknown to the voting public. A review should be made by the Executive and the legislature to determine whether confidentiality should be eliminated for candidates' financial disclosure cases at an earlier point in the enforcement process.

2. Abuse of Prestige by Elected Officials

The Ethics Law prohibits employees and non-elected officials from intentionally using their prestige of office for their own private gain or that of another. The provision excludes the provision of customary constituent services. Elected officials, however, are not covered by this provision. In the last several years the Commission has received allegations involving various elected officials under its authority alleging that they had misused their position for their own gain or gain of another. Because the Law does not cover this type of activity by elected officials, the Commission has been unable to respond these allegations. The Commission recommends that §3-104 of the the existing Law be amended to include elected officials, or that a new provision covering these officials dealing with clear cases of abuse should be specifically added to the law.

3. Clarifying Matters Regarding Spousal Interest and Gifts

Issues regarding the spouses of employees or officials have arisen in Maryland and on a national basis. The Maryland Public Ethics Law does not consistently and clearly address these issues or provide sufficient policy guidance in these matters. Spouse ethics issues have become more prevalent in part as a reflection of both spouses having careers and other economic relationships. The Maryland Law does cover reasonably well the non-participation requirements where an official or employees' spouse is impacted by a decision. Also, the lobbyist reporting provisions specifically include gifts to spouses.

The Law does not clearly deal with the acceptability of gifts to spouses of officials or employees by prohibited donors. Additionally, the financial disclosure provisions do not clearly require gifts received by the spouse to be disclosed by the employee or official even where such gifts are from donors normally requiring official's disclosure. Another significant area needing further clarification is under what circumstances is the ownership interest of a spouse to be attributed to the official or employee for conflict of interest purposes under §3-103(a) of the Ethics Law. The Commission believes that it could better administer the Law and that clearer notice would be available to those covered by the Law if these issues were more expressly addressed in the statute.

4. Clarify the Impact of the Law Enforcement Officers Bill of Rights

The provisions of the Law Enforcement Bill of Rights have substantial impact on investigation and enforcement of matters relating to law enforcement officers. The Commission does not believe that this law was meant to impact on the operations of the State Ethics Commission. The Commission has been aware of several matters involving law enforcement officers that could involve violation of the Ethics Law. Often these cases can be properly deferred to criminal enforcement agencies. The Commission believes, however, that it is important for this issue to be expressly dealt with by the statute to avoid unnecessary controversy and litigation involving law enforcement officer ethics cases.

Other Legislative Recommendations

The recommendations listed below were made in previous annual reports. The Commission continues to believe that these recommendations are appropriate, based on its experience in administering the ethics program:

- The law should be formally clarified to deal with fund raising by employees and officials that is not clearly regulated by the State election laws.
- There is a need to review whether the requirement that a lobbyist must always be in the physical presence of an official in order to be required to register should be retained in the Law.
- Some consideration should be given to removing the current language dealing with Commission review of forms in section 2-103(e), and substituting a provision for review consistent with standards to be established by the Commission.
- The word "minor" should be removed from the participation prohibitions in section 3-101(a) of the Law to avoid situations where different results occur depending on whether the adult employee involved is the child or the parent of the person having the interest.
- There is a need to consider adding former officials and employees to the persons prohibited from using confidential information under section 3-107 of the Law.
- The bi-county agency ethics regulation requirements should be reviewed to make sure that sufficient penalty provisions are provided and that the regulations as drafted meet the intent of the Law.
- In order to avoid uncertain and confusing application and administration of the Law, the special provisions of section 6-202 making members of State boards funded in whole or in part by Baltimore County subject to the county disclosure law instead of the State law should be considered for elimination.
- The current law seems to suggest that gifts from foreign governments are excluded from the gift and lobbying provisions of the ethics law. There is a need to review this issue and clarify the law.

- The criteria for financial disclosure by executive and legislative branch officials utilize qualitative considerations in addition to salary. The financial disclosure standards for judicial branch employees utilize only a salary standard. As a result of this standard, certain judicial personnel such as court reporters are included in the filing requirements. The Commission believes the judicial financial disclosure standards should be amended to include qualitative criteria in addition to salary.

- The provisions for confidentiality in the Ethics Law should be reviewed to determine if they adequately protect privacy without denying needed information to operational agencies or the public.

- Consideration should be given to having new officials file a financial disclosure statement covering their holdings as of the time when they come into their position rather than for the previous calendar year.

- The Ethics Law prohibits certain types of representation before State agencies. However, except for legislative disclosure under section 3-102 of the Ethics Law, there is no required disclosure of representation before State agencies. It is recommended that officials who appear before State agencies for compensation include on their annual disclosure form at a minimum the identity of any agencies involved in this compensated representation.

- The need for disclosure of interests in mutual funds should be reviewed to determine if this information is fully necessary to accomplish the purposes of the Law.

- The provisions of section 4-104(c) regarding attributable interests should be modified to reduce the burden caused by the disclosure requirements when a person has a small share in a large diverse testamentary trust.

- The provisions covering school board ethics regulations need to be strengthened to assure that there are adequate sanctions for violations by board members, candidates for board membership and lobbyists.

- The Commission should be authorized by Law to have limited fining authority in financial disclosure, lobbyist and conflict of interest matters, thus avoiding expensive protracted litigation in minor cases.

- The Law should be expressly clarified to state the court actions in review of Commission decisions or requests for fines are to be on the record and not de novo.

- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other State officials.

- The requirements for disclosure of real property held in the name of a partnership should be amended to make sure that this interest is required to be disclosed even where the partner has less than a 30% interest in the partnership and the interest is held in partnership name.

A P P E N D I X 1

EMPLOYER SPENDING \$25,000 OR MORE
ALL REGISTRANTS - ALL TYPES OF LOBBYING EXPENSES

NOVEMBER 1, 1985 - OCTOBER 31, 1986

<u>TOTAL AMOUNT</u>	<u>EMPLOYER</u>
1. \$ 154,298.54	Maryland Chamber of Commerce
2. 138,112.38	Health Facilities Association of Maryland
3. 113,181.00	RAJ Chemicals, Inc.
4. 111,332.80	Medical Mutual Liability Insurance
5. 93,517.07	A T & T
6. 87,018.52	Maryland National Bank
7. 82,032.22	C&P Telephone Company of Maryland
8. 80,613.31	Potomac Electric Power Company
9. 80,494.86	Marylanders for Malpractice Liability Reform
10. 78,774.00	Citibank (MD.) N.S., T/A Choice
11. 76,203.65	Maryland Classified Employees Association
12. 74,394.61	Associated Builders & Contractors
13. 72,949.00	Baltimore Gas & Electric Company
14. 64,969.04	Mid Atlantic Food Dealers Association
15. 64,924.55	Tobacco Institute
16. 63,138.30	Maryland State & D.C. AFL-CIO
17. 61,574.08	Bethesda Chevy Chase Chamber of Commerce
18. 59,797.00	Maryland Hospital Association
19. 58,062.05	Common Cause/Maryland
20. 56,466.16	AAA Maryland
21. 56,353.26	Traffic Safety Now, Inc.
22. 56,312.00	Maryland Committee for Safety Belt Use
23. 56,282.46	First National Bank of Maryland

24.	51,586.96	Automobile Trade Association of Maryland
25.	51,308.72	Blue Cross & Blue Shield of Maryland
26.	50,764.35	Maryland Natural Gas (Division of Washington Gas Light)
27.	50,168.87	Group Hospitalization & Medical Services, Inc.
28.	48,834.00	Maryland State Teachers Association
29.	48,194.57	Crown Central Petroleum Corporation
30.	47,859.37	American Family Life Assurance
31.	45,986.43	Montgomery County Council
32.	44,632.83	B & O Railroad Company
33.	43,967.14	Medical & Chirurgical Faculty of State of Maryland
34.	42,390.15	James T. Lewis Enterprises, Ltd.
35.	41,452.82	Baltimore Federal Financial
36.	40,873.24	State of Maryland Institute of Home Builders
37.	40,753.40	National Association of Independent Insurers
38.	40,109.61	Maryland Society of Eye Physicians & Surgeons
39.	38,209.63	National Federation of Independent Businesses
40.	37,264.00	Planned Parenthood of Maryland
41.	37,263.81	Apartment & Office Building Association of Metropolitan Washington
42.	37,098.81	Sperry Corporation
43.	36,790.42	Association of Maryland Pilots
44.	36,116.22	Household International
45.	36,050.00	Maryland Greyhound Club
46.	35,925.00	Nationwide Mutual Insurance Companies
47.	34,086.00	Maryland State Dental Association

48.	33,672.22	Health Insurance Association of America
49.	32,996.95	Maryland Citizen Action Coalition
50.	32,878.70	Maryland Association of Tobacco & Candy Distributors, Inc.
51.	32,659.86	Maryland Farm Bureau
52.	32,615.00	Kaiser-Foundation Health Plan of Mid Atlantic States
53.	31,639.66	Maryland Retail Merchants
54.	31,346.63	American Petroleum Institute
55.	30,847.00	Maryland Association of Realtors, Inc.
56.	30,680.00	Maryland Psychological Association, Inc.
57.	30,617.54	Motorcycle Industry Council, Inc.
58.	30,534.25	Washington Healthcare Management Corporation
59.	29,711.00	Chesapeake Bay Foundation, Inc.
60.	29,490.00	Maryland Trial Lawyers Association
61.	29,332.75	Chemical Industry Council
62.	29,030.23	Maryland Bankers Association
63.	28,882.86	FMC Agricultural Chemicals
64.	28,873.00	Maryland Association of Chain Drug Stores
65.	28,159.76	FMC Corporation
66.	27,959.00	Johns Hopkins University
67.	27,312.96	MD/Del. Cable TV Association, Inc.
68.	26,843.35	American Medical International
69.	26,601.91	American Insurance Association
70.	26,585.00	Independent Insurance Agents of Maryland
71.	26,303.47	Provident Bank of Maryland
72.	26,166.05	Chase Bank of Maryland

73.	25,957.00	Maryland Independent College & University Association
74.	25,684.41	Licensed Beverage Distributors of Maryland
75.	25,492.37	Maryland General Hospital
76.	25,159.30	Montgomery County Board of Realtors
77.	25,100.00	Systems Control, Inc.

NOTE: The Maryland Jockey Club of Baltimore City reported total expenditures of \$214,345.95. However, \$210,090.00 of these reported expenditures was the value of race track passes distributed to officials.

A P P E N D I X 2

LOBBYISTS LISTING \$50,000 OR MORE IN COMPENSATION
FOR ALL CLIENTS

NOVEMBER 1, 1985 - OCTOBER 31, 1986

	<u>TOTAL AMOUNT</u>	<u>LOBBYIST</u>
1.	\$521,955.75	BEREANO, Bruce C.
2.	240,936.04	DOYLE, James J., Jr.
3.	203,516.90	GOLDSTEIN, Franklin
4.	184,666.75	COOKE, Ira C.
5.	141,030.00	MANIS, George N.
6.	112,957.02	DOOLAN, Devin John
7.	92,175.00	SCHWARTZ, Joseph A., III
8.	88,710.00	GOEDEN, James P.
9.	83,131.75	ADLER, Maxine
10.	79,496.88	PITCHER, J. William
11.	78,656.71	BURRIDGE, Carolyn T.
12.	72,130.62	DOHERTY, Daniel T., Jr.
13.	69,041.10	MIDDLETON, Michael C.
14.	59,058.00	NEIL, John B.
15.	57,500.00	ROMBRO, Richard T.
16.	56,375.00	AISENSTARK, Avery
17.	52,743.72	GRAY, Carroll
18.	50,727.50	RIEDY, Mark J.

